

**IN THE UNITED STATE DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION**

**UNITED STATES OF AMERICA**  
**PLAINTIFF**

**V.**

**GUY BENJAMIN BOWMAN**  
**DEFENDANT**

)  
)  
)  
) **CASE NO. : 1:22-CR-021-001**  
)  
)  
)

**MOTION FOR DOWNWARD VARIANCE**  
**AND/OR DEPARTURE IN SENTENCE**

COMES NOW the Defendant, Guy Benjamin Bowman, by and through counsel, and moves this Honorable Court pursuant to 18 U.S.C. § 3553, for a downward variance and/or departure from his computed sentencing guidelines. As grounds for his motion, he incorporates by reference the grounds and arguments set forth in his Sentencing Memorandum.

WHEREFORE, the Defendant, Guy Benjamin Bowman, respectfully prays that his Motion for Downward Variance and/or Departure in Sentencing be granted and for any other relief that the Court deems just and proper.

RESPECTUFLY SUBMITTED

GUY BENJAMIN BOWMAN

BY: /s/Don M. Williams, Jr.  
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**CERTIFICATE OF SERVICE**

I, Don M. Williams, Jr., hereby certify that I have this the 21<sup>st</sup> day of November, 2022, electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to the Assistant United States Attorney.

/s/ Don M. Williams, Jr.

DON M. WILLIAMS, JR.